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**VIA ELECTRONIC FILING**

The Honorable Harvey Bartle III  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, PA 19106

**RE: Derrick Jacobs v. City of Philadelphia, et al., Case No. 2:19-cv-04616**

Dear Judge Bartle:

We have recently been engaged to represent Defendant Tracy Tripp in the above captioned matter. New counsel have also been engaged to represent the other defendants. Pursuant to the Court's November 21, 2022 Scheduling Order (ECF 74), the deadline for fact discovery is March 31, 2023. Due to the complex procedural history of this matter, including several amended pleadings, attempted amended pleadings, motion practice, and appeals, the parties have not completed written discovery, their respective document productions, or taken depositions. Counsel for all defendants therefore respectfully request the Court to extend the discovery deadline by ninety (90) days to June 30, 2023.

On March 10, 2023, counsel for defendant Tripp asked Mr. Jacobs to join the defendants' request for an extension of the case deadlines. He has not responded.

Respectfully submitted,

Samantha Banks

For SCHNADER HARRISON SEGAL & LEWIS LLP

cc via ECF and electronic mail:

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